

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DARLINGTON AMADASU

Plaintiff

Case No: C - 1- 01 - 210

Black/Dlott

-v-

JAMES R. DONOVAN, MD, et al
Defendants

PLAINTIFF'S FIRST REQUESTS FOR ADMISSION
UPON DEFENDANT MURIEL POHL

Pursuant to FRCP 36 Plaintiff hereby serves on Defendant Muriel Pohl Plaintiff first set of Requests for Admission set forth below to be answered by defendant within 30 days from the date of service.

DEFINITIONS

"Defendant" herein refers to Muriel Pohl ("Pohl").

INSTRUCTIONS

1. Provide a response to each request separately.
2. If there is an objection to a request, state the complete specific basis for every such objection.

REQUESTS FOR ADMISSION

1. Admit: Plaintiff: (a) was a 'practicum phase' occupational medicine resident beginning from July 1999 and expected to end June 2000.

ANSWER:

2. Admit: plaintiff did not sexually harass any female job applicant the Center for Occupational Health (COH)

ANSWER:

3. Admit: you have no record of any written complaint of sexual harassment from any female at COH against plaintiff;

ANSWER:

4. Admit: you have no personal knowledge of any sexual harassment of any female at COH by Plaintiff;

ANSWER:

5. Admit: you have no evidence and or proof of any sexual harassment of any female at COH by plaintiff.

ANSWER:

6. Admit: you were/are the nurse assigned to work at COH and your duty included to chaperon physicians at COH.

ANSWER:

7. Admit: black female job applicant (Applicant) on 2/16/00 visited the Center for Occupational Health (COH) for pre-placement employment medical assessment.

ANSWER:

8. Admit: defendant Donovan assigned the applicant to plaintiff and you directed the applicant to exam room and left the room.

ANSWER:

9. Admit: you failed to chaperon plaintiff during the exam of the applicant.

ANSWER:

10. Admit: you had no personal knowledge about what took place in the room during the exam.

ANSWER:

11. Admit: you were not in the exam room when Donovan and plaintiff together saw and spoke to the applicant

ANSWER:

12. Admit: you have no personal knowledge of when and why Donovan directed plaintiff to phone the applicant.

ANSWER:

13. Admit: the applicant did not complain about anything or against plaintiff from 2/16/00 to 2/21/00

ANSWER:

14. Admit: on or about 2/21/00 Donovan directed you to phone and solicit involuntary information from the applicant, which you did.

ANSWER:

15. Admit: on or about 2/21/00 you documented the information you got from the applicant in her medical chart.

ANSWER:

16. Admit: you documented that she had her an exam here (i.e., COH) on 2/16/00 and felt uncomfortable about it but did not say anything at the time.

ANSWER:

17. Admit: you documented, she said Africa was mentioned and wanted to tell her about Africa; she said to him "that's ok, I want to visit there someday"

ANSWER:

18. Admit: the applicant did not tell you who mentioned Africa but she did tell you she wanted information about Africa because she wanted to visit there someday.

ANSWER:

19. Admit: you documented that she was directed by plaintiff to perform some physical maneuver consistent with occupational musculo-skeletal physical exam.

ANSWER:

20. Admit: you documented that she was asked if her personal identification and demographic information in the chart were correct which is consistent with verification of information given by patient on the COH form.

ANSWER:

21. Admit: you documented that she got and ignored phone message on 2/17/00 but she did not tell you the nature and substance of the phone message.

ANSWER:

22. Admit: you documented that on 2/18/00 she answered the phone but she said she wasn't there and she impersonated her sister called "Bridgett" and nothing further was said.

ANSWER:

23. Admit: the applicant never told you specifically that plaintiff sexually harassed her.

ANSWER:

24. Admit: you never documented on 2/21/00 that the applicant told you specifically that plaintiff sexually harassed her.

ANSWER:

25. Admit: the applicant never told you specifically that plaintiff attempted at dating activity with her.

ANSWER:

26. Admit: you never documented on 2/21/00 that the applicant told you specifically that plaintiff attempted at dating activity with her.

ANSWER:

27. Admit: subsequent to your 2/21/00 documentation, on or about 4/19/00, i.e., about 2-months later, you told Donovan that the applicant told you specifically that plaintiff sexually harassed and attempted at dating her

ANSWER:

28. Admit: Donovan said that you had told him the allegation in preceding admission request # 27.

ANSWER:

29. Admit: you have no record of the applicant's written and signed complaint of sexual harassment and attempted dating activity with her by plaintiff.

ANSWER:

30. Admit: you had not further communication or contact with the applicant after 2/21/00.

ANSWER:

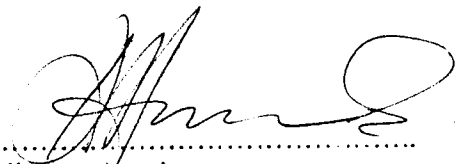
31. Admit: your documentation of the purported applicant's allegation in her medical chart was improper
ANSWER:

32. Admit: you and physicians at COH did and do call patients to pass onto and collect some information or things from them pertinent to the purpose of their visits to COH.
ANSWER:

33. Admit: over more than 36 days after the job applicant exam on 2/16/00 without her oral or written specific complaint against plaintiff, on 3/22/00 you and Donovan phoned and persuaded the applicant to file false complaint against plaintiff with the State Medical Board of Ohio;
ANSWER:

34. Admit: you and Donovan combined persuading the applicant to file false complaint against plaintiff with the State Medical Board of Ohio was/is outside the scope of your employments and your job descriptions.
ANSWER:

35. Admit: the COH Patient Information Form completed by the applicant on 2/16/00 is without information about her marital status, i.e., married, divorce, or single.
ANSWER:


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Darlington Amadasu
Plaintiff, Pro Se

CERTIFICATE OF SERVICE:

I hereby certify that the foregoing was served on Justin D. Flamm by personal delivery to his receptionist and on Ramiro Canales, P.O. Box 12548, Capitol Station, Austin, TX 78711 by USPS mail to his address on 11/29/04.

